

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NO. 2004-CR-10194RCL

UNITED STATES

v.

ANTHONY BUCCI

MOTION TO AMEND ORDER OF RELEASE

Now comes Anthony Bucci, in the above-numbered indictment, and requests that the Court consider amending its Order of Release from requiring a bond in the amount of \$300,000 on the property at 500 Salem Street, Apartment # 607, Medford, Massachusetts and \$25,000 for 6 Maple Road, North Reading, Massachusetts to \$250,000 for 500 Salem Street, Apartment # 607, Medford, Massachusetts and \$100,000 for 6 Maple Road, North Reading, Massachusetts.

In support thereof, it appears that the Medford property was appraised at \$295,000 rather than \$300,000, plus there is a mortgage (equity line) on the property for \$30,000.00. However, according to attachment A, the amount owed is \$14,283.71. therefore, to err on the side of caution it is requested that the bond be set in the amount of \$250,000 on this property.

A review of the property at 6 Maple Road, North Reading, Massachusetts has an appraised value of \$580,000. It is reasonable to infer that the mortgage of \$198,000 from Ameriquest Mortgage Company was discharged when World Savings Bank recorded a mortgage of \$375,000.00 (it is doubtful, if at time of this mortgage, the property could have carried both mortgages). Therefore, also adding in another \$25,000 from World Savings Bank (this clearly shows the first mortgage was discharged), this property has equity of \$180,000 and as act of good faith, Mr.

Bucci will place a bond on this property for \$100,000, thereby securing his appearance by a bond in the amount of \$350,000.

Respectfully submitted,
FOR THE DEFENDANT,



Barry P. Wilson
LAW OFFICES OF BARRY P. WILSON
240 Commercial Street
Suite 5-A
Boston, MA 02109
(617) 248-8979
(617) 523-8700 (Fax)
BBO# 529680

Dated: 8/19/04

Attachment A

**Everett
CO-OPERATIVE
Bank**

419 Broadway
Everett, MA 02148
Phone: (617) 387-1110
Fax: (617) 381-0924

July 20, 2004

To Whom It May Concern:

This is to inform you that,

Name: George B. Keefe
Rosemarie K. Keefe

Address: 500 Salem Street, Unit 607
Medford, MA 02155-3382

Has established the following accounts at the Everett Co-operative Bank:

Type of Account	Account Number	Date Opened	Current Balance
Home Equity Line of Credit	690027917314	04-08-1998	14,283.71

This customer receives a monthly direct deposit from _____
for \$ _____.

If you have any questions, please feel free to contact Customer Service at (617) 387-1110.

Sincerely,

Patricia Pratt
Patricia Pratt
Customer Service Representative

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF)
AMERICA,) CRIMINAL ACTION NO.
VS.) No. 2004-CR-10194RCL
ANTHONY BUCCI)
Defendant.)

CERTIFICATE OF SERVICE

I, Barry P. Wilson, do hereby certify that by hand delivery and fax I did serve one (1) copy of the within "Motion to Amend Order of Release," on Thursday, August 19, 2004, to John Farley, A.U.S.A., United States District Court, 1 Courthouse Way, Suite 9200, Boston, MA 02210

Date: August 19, 2004


Barry P. Wilson

BARRY P. WILSON, ESQ.
240 Commercial Street
Suite 5A
Boston, MA 02109

(617) 248-8979
FAX NO. 617/523-8700

FACSIMILE TRANSMITTAL FORM

TO:

Nororable Judge Anderson FAX NO.: 617 748 4184
U.S. Courthouse DATE: 8/19/04
Boston MA 02110

RE:

USA & Buco

COMMENTS: Enclosed please find Motion to Amend Order of Release that will file today.
Deny Other

IF YOU EXPERIENCE DIFFICULTY RECEIVING THIS TRANSMISSION,
PLEASE CALL 617/248-8979.

NUMBER OF PAGES INCLUDING COVER SHEET: 5

ORIGINAL TO FOLLOW VIA: hand MAIL MESSENGER.

THE INFORMATION CONTAINED IN THIS FAX MESSAGE IS INTENDED ONLY FOR THE PERSONAL AND CONFIDENTIAL USE OF THE DESIGNATED RECIPIENTS NAMED ABOVE. THIS MESSAGE MAY BE AN ATTORNEY-CLIENT COMMUNICATION, AND AS SUCH IS PRIVILEGED AND CONFIDENTIAL. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR AN AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT YOU HAVE RECEIVED THIS DOCUMENT IN ERROR, AND THAT ANY REVIEW, DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US BY MAIL. THANK YOU.